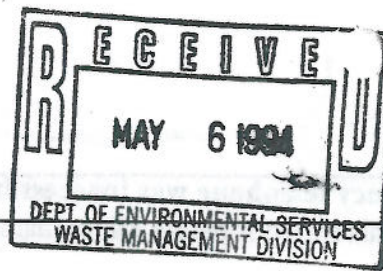


JOHNSON & JOHNSTON  
ASSOCIATES, INC.

130 ROUTE 111  
HAMPSTEAD, NH 03841  
TELEPHONE (603) 329-5691  
FAX (603) 329-8307



JJA



mm 5/6/94  
TL LL 5/6/94  
SS ✓

May 4, 1994

Mr. Kenneth W. Marschner  
Waste Management Division  
NH Department of Env Services  
6 Hazen Drive  
Concord, NH 03301-6509

Dear Kenneth,

This letter is written in response to your Letter of Deficiency No: WMD-94-05.

Please accept the following as descriptions of the corrective measures taken, on an item by item basis:

1. **Hazardous waste determination.** Two unlabeled containers were found in a snow drift. One 5 gallon, and one 55 gallon. The 55 gallon was found to be empty, and has been properly disposed of. The 5 gallon contained used motor oil. It was labeled, and disposed of through Laidlaw on manifest #(MAH549617), attachment #1.
2. **General Inspections were not being done weekly.** Since your visit, we have been consistently performing inspections on a weekly basis. Please see attachment #2, a copy of our signed off log sheet. We will continue at this frequency.
3. **JJA did not have proper documentation of the required Hazardous Waste training.** At the time of your inspection, we had recently completed a Hazardous waste training course, and the complete documentation was in process of being assembled by our consultant. Please find enclosed attachment #3, a document which lists the personnel trained, their date of training, and the job descriptions they fill. Also attached (attachment #4) is a letter that describes our plan to add training needs to our job descriptions. It includes a sample Job Description. As of this writing, all of our principle production, and warehouse positions that require Hazardous Waste Training have had their job descriptions modified, and are in approval.

4.. **The emergency telephone was inaccessible, and there was no water source available.** This is two separate issues, namely:


- The emergency telephone has been relocated out of the office, to allow accessibility to all personnel.
- Enclosed you will find attachment #5, a purchase requisition for a 33 gallon FFP extinguisher for our Hazardous Waste area. Due to be delivered on May 10, 1994.

5. **Inadequate and not updated contingency plans were available.** We have begun an update effort to improve our Contingency Plan. A marked up copy of the plan is included with this letter. (Attachment #6) Please let me know as soon as possible if there are any remaining deficiencies, to allow me to release only a correct plan. Formal plans will be properly typed, and filed according to correct practices with all applicable agencies.
6. **Emergency Postings not available.** We have subsequently posted a listing of emergency numbers, and have included in our contingency report the list of steps to be taken. Please see attachment #7 & 8, our wall postings.
7. **Manifest Information.** Laidlaw prepares all our manifests for us. As a result we have asked them to add a manifest number in future. Please see attached a copy of their memo to us. (attachment #9) We will monitor future manifests to assure correct compliance.
8. **Record keeping.** Due to transitions and personnel changeovers prior to June 1993, some of our early records were incomplete. We believe our present record keeping system to be correct. Please see attachment #10, a procedure for correctly controlling Waste handling through our shop. We believe it correctly describes record keeping compatible with current regulations.

Additionally enclosed (attachment #11) is a copy of a letter to Patricia Reichard regarding our discharge of non-contact cooling water. We believe the matter to be closed, requiring no further action.

In summary, we believe we have corrected all of the above deficiencies within the 30 days. Please let us know if we need further actions at this time.

Sincerely,



Bob Bean, Plant Engineering

Johnson & Johnston Associates, Inc.